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This is intended as a full and complete response to the Final Office Action dated August 25, 2004, having a shortened statutory period for response set to expire on November 25, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 30-32, 34, 36-39, 42, and 50-53 remain pending in the application and are shown above. Claims 30-32, 34, 36-39, 42, and 50 stand rejected and claims 51-53 stand withdrawn by the Examiner. Reconsideration of the rejected claims is requested for reasons presented below.

Applicants propose canceling claims 51-53. Applicants propose amending claims 30 and 36 to more clearly recite the claimed invention. Applicants submit that the changes proposed herein do not introduce new matter and reduce the issues for appeal.

Claims 30-32, 34, 36-39, 42, and 50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wang* (U.S. Patent No. 6,391,166) in view of *Reed* (U.S. Patent No. 4,828,654) or *Bhatt, et al.* (U.S. Patent No. 5,156,730), on grounds that it would have been obvious to mount the anode segments of *Wang* to an anode support mounted on an anode base because the anode segments would have been securely positioned as shown by *Reed* or *Bhatt, et al.* Applicants respectfully traverse the rejection.

Applicants propose amending claims 30 and 36 to specify that one insulating member contacts two anode segments. *Wang* shows insulating walls between adjacent anode segments that allow individual anode segments to be exposed to different flows of electrolyte in distinct sub-plating baths defined by the insulating walls. *Wang* does not show or describe an insulating member that contacts two anode segments or an anode support. *Reed* describes anode segments suspended by one support member 36 to achieve an insulating effect between the anode segments (column 4, lines 16-20). *Reed* does not show or describe an apparatus having both an anode support and multiple insulating members, wherein one insulating member contacts two anode segments. *Bhatt, et al.* describes anode segments supported on one insulating rack 7

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(column 3, lines 27-28). *Bhatt, et al.* does not show or describe an apparatus having both an anode support and multiple insulating members, wherein one insulating member contacts two anode segments. Applicants submit that the combination of *Wang* with *Reed* or *Bhatt, et al.* does not teach or suggest an electrolytic cell as recited in proposed claims 30 and 36 as the combination of *Wang* with *Reed* or *Bhatt, et al.* does not provide an electrolytic cell that has both an anode support and insulating members, wherein one insulating member contacts two anode segments.

Applicants further submit that the combination of *Wang* with *Reed* or *Bhatt, et al.* does not provide a suggestion, motivation, or reasonable expectation of success for modifying the apparatus of *Wang* to include an insulating member that contacts two anode segments. Applicants note that although *Wang* could be modified to having an insulating member contacting two adjacent anode segments by eliminating the spaces between the anode segments and the insulating walls, such a modification would substantially alter the apparatus of *Wang* as it would eliminate the individual sub-plating baths around the different anode segments.

Thus, *Wang* in view of *Reed* or *Bhatt, et al.* does not teach, show, or suggest an electrolytic cell comprising an electrolyte container comprising an anode base, a plurality of anode segments positioned in the electrolyte container, wherein a first anode segment of the plurality of the anode segments is surrounded by a second anode segment of the plurality of the anode segments, and wherein at least one of the plurality of anode segments is mounted to at least one anode support mounted on the anode base such that an electrolyte solution channel is defined between the plurality of anode segments and the anode base, insulating members positionable between adjacent segments of the plurality of anode segments, wherein one of the insulating members contacts both the first anode segment and the second anode segment, and an electrical source coupled to each of the anode segments, as recited in proposed claim 30. Applicants respectfully request withdrawal of the rejection of claim 30 and of claims 31, 32, 34, which depend thereon.


Furthermore, *Wang* in view of *Reed* or *Bhatt, et al.* does not teach, show, or suggest an electrolytic cell comprising an electrolyte container comprising an anode base, an electrolyte solution input port, a plurality of concentric anode segments

positioned in the electrolyte container, wherein at least one of the plurality of anode segments is mounted to at least one anode support mounted on the anode base such that an electrolyte solution channel is formed between the plurality of anode segments and the anode base and wherein the anode segments are positioned with spaces therebetween such that electrolyte solution from the electrolyte solution input port can pass from the electrolyte solution channel below the anode segments to above the anode segments through the spaces between the anode segments, and insulating members positioned between adjacent segments of the plurality of anode segments, wherein one insulating member contacts two adjacent anode segments, as recited in proposed claim 36. Applicants respectfully request withdrawal of the rejection of claim 36 and of claims 37-39 and 42, which depend thereon.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the Final Office Action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

  
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